

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JANE DOE,

Plaintiff,

**VERIFIED ANSWER
CV 15-3620**

-against-

BIANCO, J.

SHIELDS, M.J.

HOLY BAGEL CAFE II, INC. d/b/a BAGEL CAFE
d/b/a BAGEL CAFE II, SANG CHON LEE, EN SEOUN
LEE and LUDWIN R. SANCHEZ a/k/a ROBERTO
SANCHEZ,

Defendants,
-----X

Defendant LUDWIN R. SANCHEZ, by their attorneys, Young &
Young, LLP, hereby responds to plaintiff's complaint as follows:

(1) Defendant denies knowledge or
information sufficient to form a belief as to the allegations set
forth in paragraphs "1", "2", "3", "4", "5", "6", "8", "9", "10",
"11", "12", "13", "14", "15", "16", "17", "18", "19", "20", "21",
"23", "24", "25", "29", "30", "31", "32", "33", "43", "44", "45",
"46", "51", "52", "55", "56", "57", "58", "85", "94", "102",
"105", "106", "107", "108", "109", and "110" of the complaint
herein.

(2) With respect to the allegations set
forth in paragraph "7", "28", "34", "35", "36", "37", "38", "39",
"40", "41", "42", "47", "48", "49", "50", "51", "53", "59", "60",
"61", "62", "63", "64", "65", "66", "67", "68", "69", "70", "71",
"72", "73", "74", "75", "76", "77", "78", "79", "80", "81", "82",

"83", "84", "86", "87", "88", "89", "90", "91", "92", "93", "95", "96", "97", "98", "99", "100", "101", "103", and "104", of the complaint herein, the defendant denies the allegations set forth therein.

(3) With respect to the allegations set forth in paragraph "27", and "28" of the complaint defendant admits those allegations.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

(4) Plaintiff's complaint fails to state a claim for which relief can be granted.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

(5) Plaintiff fails to join a necessary and indispensable party to the action.

AS AND FOR A THIRD AFFIRMATIVE DEFENSE

(6) Waiver.

AS AND FOR A FOURTH AFFIRMATIVE DEFENSE

(7) Estoppel.

AS AND FOR A FIFTH AFFIRMATIVE DEFENSE

(8) This Court lacks jurisdiction over the person of the defendant.

AS AND FOR A SIXTH AFFIRMATIVE DEFENSE

(9) Any statements made by defendant regarding plaintiff were and are true and accurate.

AS AND FOR A SEVENTH AFFIRMATIVE DEFENSE

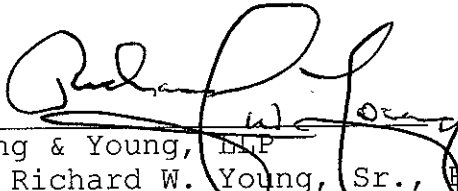
(10) Plaintiff has unclean hands.

AS AND FOR A EIGHTH AFFIRMATIVE DEFENSE

(11) Defendant is entitled to qualified immunity for any actions claimed by plaintiff because defendant performed the services complained at the direction of an attorney during the course of litigation.

WHEREFORE, defendant demands that the plaintiff's complaint be dismissed, costs assessed; and for a judgment against plaintiff in an amount to be determined by the trier of fact, such amount greater than the jurisdictional limit of any lower court of competent jurisdiction; and further relief as the court may deem just, proper and equitable.

Dated: Central Islip, New York
February 4, 2016



Young & Young, LLP
By: Richard W. Young, Sr., Esq.
(RWY-7633)
Attorneys for the Defendant
863 Islip Avenue
Central Islip, NY 11722
(631)224-7500

To: Michael Zilberg, Esq.
Certain & Zilberg, PLLC
Counsel to Plaintiff JANE DOE
909 Third Avenue, 28th Floor
New York, New York 10022

STATE OF NEW YORK)
) ss.:
COUNTY OF SUFFOLK)

LUDWIN R. SANCHEZ, being duly sworn, deposes and says:

I am the defendant herein and a party in the within action;
that I have read the foregoing verified answer and knows the
contents thereof and the same is true to the knowledge of the
deponent except to those matters therein alleged to be stated
upon information and belief and as to those matters he believes
it to be true.

Dated: February 4, 2016
 Central Islip, New York


LUDWIN R. SANCHEZ

Sworn to before me
this February 4, 2016


NOTARY PUBLIC

